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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 16 2011

JAMES R. LARSEN, CLERK
DEPUTY
SPOKANE, WASHINGTON

6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 vs.

11 WADE LYNN KURT

12 Defendant.

CR-11-161-WFN

INDICTMENT

Vio: 18 U.S.C. § 1028A
Aggravated Identity Theft
(Count 1)

Vio: 18 U.S.C. § 1028(a)(1)
Unlawful Production of an
Identification Card
(Counts 2 and 4)

Vio: 18 U.S.C. § 1028(a)(4)
Unlawful Possession of an
Identification Card
(Counts 3 and 5)

Vio: 18 U.S.C. § 1001
False Statement (Count 6)

18 The Grand Jury Charges:

19 COUNT 1

20 On or about the 30th day of June, 2010, in the Eastern District of
21 Washington, the Defendant, WADE LYNN KURT did knowingly use, without
22 lawful authority, a means of identification of another person, to wit: C.H., during
23 and in relation to making a materially false or fraudulent statement or
24 representation, in violation of 18 U.S.C. § 1001, to wit: by presenting a fraudulent
25 Washington State Driver's License bearing WADE LYNN KURT'S picture in the
26 name of C.H., to Postal Authorities and fraudulently signing the name C.H., in
27 order to obtain a Post Office Box, all in violation of 18 U.S.C. § 1028A.
28

INDICTMENT - 1

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COUNT 2

On an exact date unknown, but by on or about the 31st day of August, 2010, in the Eastern District of Washington, the Defendant, WADE LYNN KURT, did knowingly and without lawful authority produce an identification document, to wit: a social security card that is or appears to be issued under the authority of the United States, bearing the name Clare D. Bermudez and social security number 430-15-XXXX, all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(A)(i).

COUNT 3

On or about the 31st Day of August, 2010, in the Eastern District of Washington, the Defendant, WADE LYNN KURT, did knowingly possess an identification document not issued lawfully for the use of the defendant, to wit: a social security card bearing the name Clare D. Bermudez and social security number 430-15-XXXX, with the intent such document or feature be used to defraud the United States, and the offense involved the production of this identification document that is or appears to be an identification document or authentication feature issued by or under the authority of the United States, in violation of Title 18, United States Code, Section 1028(a)(4) and (b)(6).

COUNT 4

On an exact date unknown, but by on or about the 31st day of August, 2010, in the Eastern District of Washington, the Defendant, WADE LYNN KURT, did knowingly and without lawful authority produce an identification document, to wit: a Washington State Driver's License bearing the name Clare D. Bermudez and Number BERMUCDXXXXXX, all in violation of Title 18, United States Code, Section 1028(a)(1) and (b)(1)(A)(ii).

COUNT 5

On or about the 31st Day of August, 2011, in the Eastern District of Washington, the Defendant, WADE LYNN KURT, did knowingly possess an

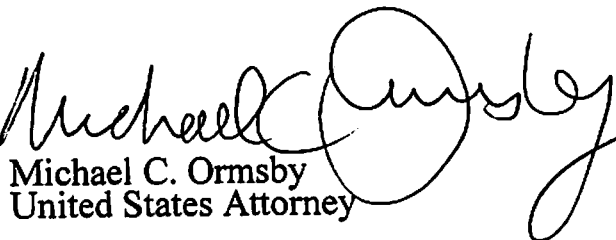
1 identification document not issued lawfully for the use of the defendant,
 2 authentication feature, or a false identification document, to wit, Washington
 3 State Driver's License bearing the name Clare D. Bermudez and Number
 4 BERMUCDXXXXX, with the intent such document or feature be used to defraud
 5 the United States, and the offense involved the production of this identification
 6 document that is or appears to be a driver's license or personal identification card,
 7 in violation of Title 18, United States Code, Section 1028(a)(4) and (b)(6).

8 COUNT 6

9 On or about the 30th day of June, 2010, in the Eastern District of
 10 Washington, the Defendant WADE LYNN KURT, did willfully and knowingly
 11 make and cause to be made a materially false, fictitious, and fraudulent
 12 statement(s) and representation(s) in a matter within the jurisdiction of a
 13 department or agency of the United States, by presenting a fraudulent Washington
 14 State Driver's License bearing WADE LYNN KURT'S picture in the name of
 15 C.H., to Postal Authorities and fraudulently signing the name C.H., in order to
 16 obtain a Post Office Box, in violation of Title 18, United States Code, Section
 17 1001.

18 DATED this 15TH day of November, 2011.

19 A TRUE BILL

20 
 21 Michael C. Ormsby
 22 United States Attorney

Foreperson

23 
 24 Stephanie Van Marter
 25 Assistant United States Attorney

26 
 27 Earl A. Hicks
 28 Assistant United States Attorney